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**UNITED STATES DISTRICT COURT
 SOUTHERN DISTRICT OF NEW YORK**

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THE NATIONAL FOOTBALL LEAGUE; and	:	
NFL PROPERTIES LLC,	:	No. []
	:	
Plaintiffs,	:	
	:	APPLICATION FOR ORDER
v.	:	TO FILE UNDER SEAL
	:	
	:	[FILED UNDER SEAL
Defendants.	:	PURSUANT TO 15 U.S.C. §
	:	1116]
	:	
-----	X	

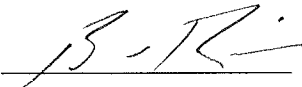
Plaintiffs THE NATIONAL FOOTBALL LEAGUE and NFL PROPERTIES LLC (collectively, “Plaintiffs” or the “NFL”) hereby make application to this Court to file under seal, pursuant to 15 U.S.C. § 1116(d)(8), the NFL’s *ex parte* Application for a Temporary Restraining Order, Order to Disable Certain Web Sites, Asset Restraining Order, Expedited Discovery Order, Order Allowing Service By Electronic Mail, and Order to Show Cause for Preliminary Injunction (the “Application”).

In order for the relief requested in the Application to serve its purpose of preventing immediate and irreparable harm to the NFL, this file must remain sealed until the hearing on the NFL’s Order to Show Cause for Preliminary Injunction. This will ensure that Defendants are not

warned about the preliminary relief requested and will prevent Defendants from shifting their financial accounts, transferring their business to new domain names, changing ISPs, and adopting new false identities. Furthermore, the Lanham Act requires that the file remain sealed until the Defendants have a chance to contest the requested Order. 15 U.S.C. § 1116(d)(8). For these reasons, the case file was sealed in similar actions that the NFL has brought in this Court. *See The National Football League v. Momo Lee d/b/a nflnfl.us*, No. 11-Civ-8911 (PKC) (S.D.N.Y. Dec. 6, 2011); *The National Football League v. Chen Cheng d/b/a nfljerseydiscount.com*, No. 11-Civ-0944 (WHP) (S.D.N.Y. Jan. 19, 2011). Accordingly, Plaintiffs respectfully request that the Court seal this file pending further order of the Court.

Dated: April 18, 2013

Respectfully submitted,

By: 

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